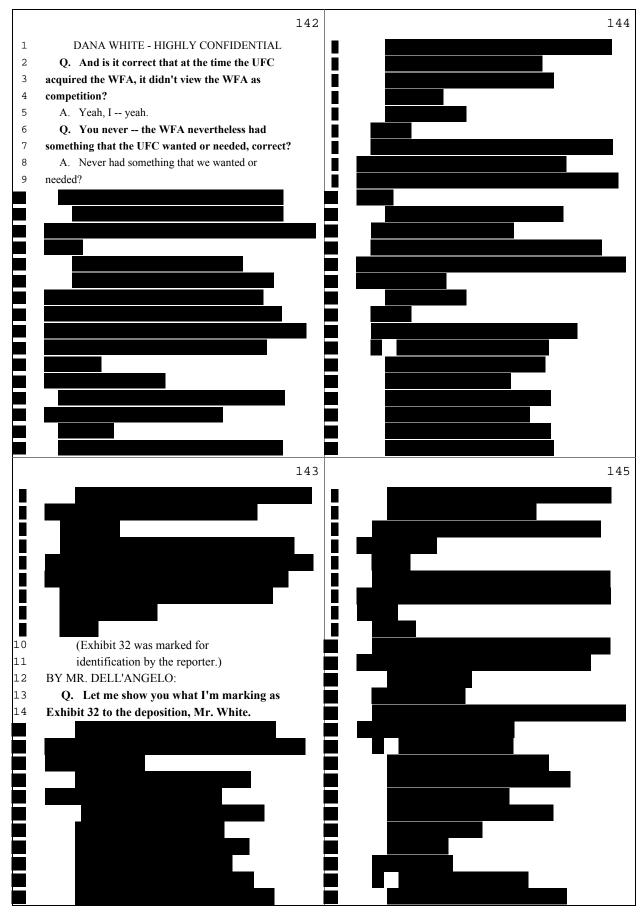
Exhibit 31

Deposition of Dana F. White (August 9, 2017) – Vol. 1 (excerpted)

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            UNITED STATES DISTRICT COURT
                DISTRICT OF NEVADA
  CUNG LE; NATHAN QUARRY, JON
  FITCH, on behalf of
  themselves and all others
  similarly situated,
            Plaintiffs,
            vs.
                                ) Case No.
                                   2:15-cv-01045-RFB-(PAL)
  ZUFFA, LLC, d/b/a Ultimate
  Fighting Championship and
  UFC,
            Defendant.
                 HIGHLY CONFIDENTIAL
       VIDEOTAPED DEPOSITION OF DANA F. WHITE
           MORNING AND AFTERNOON SESSIONS
                  LAS VEGAS, NEVADA
                    AUGUST 9, 2017
                       9:30 a.m.
REPORTED BY:
CYNTHIA K. DuRIVAGE, CSR #451
JOB NO. 51036-A
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	138		140
1	DANA WHITE - HIGHLY CONFIDENTIAL	1	DANA WHITE - HIGHLY CONFIDENTIAL
2	and stuff like that.	2	fighters have come from. I mean, even Bellator and
3	Q. All right. And did you at that time, at	3	organizations like that, they get their talent from
4	the time that you were quoted as saying, this in the	4	somewhere else. Same thing.
5	Baltimore Sun article, anticipate that the WEC would	5	Q. So, but is it correct that at the time that
6	be competitors with the UFC in some way?	6	the UFC acquired the WEC, it viewed it as a promotion
7	A. Well, I guess we would be out in the	7	that would feed fighters to it?
8	marketplace competing for sponsors.	8	A. I view everybody
9	Q. Okay. And how about for fighter talent to	9	MR. ISAACSON: Objection to form.
10	the extent that there was overlap between weight	10	THE WITNESS: as a feeder oh, sorry.
11	classes?	11	BY MR. DELL'ANGELO:
12	A. Yeah, there really wasn't any overlap.	12	Q. Go ahead.
13	There was a couple here and there, but yeah.	13	A. I view everybody as a feeder league, and
14	Q. Okay. And nevertheless, you know, you	14	Bellator sees everybody as a feeder league. When
15	expected that the UFC would compete with the WEC for	15	it's your promotion, you see everybody else as a
16	sponsors, correct?	16	feeder league.
17	A. Yep.	17	
18	Q. Okay. And so, you and then, you	18	Q. So my question is: As of the time that the UFC acquired the WEC in 2006 whether or not the UFC
19	continued to operate the UFC continued to operate	19	viewed WEC as a feeder league?
20	WEC for some time, correct?	20	A. It viewed everybody as a feeder league.
21	A. Right.	21	
22	_	22	Q. Okay. And then, the UFC merged the WEC into the UFC in October of 2010, correct?
23	Q. And is it correct that by mid-2009, the WEC was the leader in the MMA promotion industry in the	23	A. I don't know the exact date, but yes, we
24		24	eventually did.
25	bantamweight and featherweight weight classes? A. That what was?	25	-
23		23	Q. Okay. And why did the UFC merge well,
	139		141
1	DANA WHITE - HIGHLY CONFIDENTIAL	1	DANA WHITE - HIGHLY CONFIDENTIAL
2	Q. That the WEC was, you know, kind of the top	2	the UFC withdraw that.
3	promotion for bantamweight and featherweight classes?	3	The UFC merged the WEC into the UFC because
4	A. I don't know if they were the top	4	it wanted the lighter weight classes that the WEC
5	promotion, but they had they had those guys.	5	had; is that correct?
6	Q. And how would you characterize the quality	6	A. Correct.
7	of the WEC's 135 and 145 weight classes?	7	Q. And then and in doing so, the UFC
8	A. Yeah, they were really the only guys	8	acquired Urijah Faber, right?
9	it's much like Invicta. Like Invicta focuses on	9	A. Correct.
10	women, and these guys had smaller weight classes.	10	Q. Okay. And he went on to become to be
11	So like I said, people said it couldn't be	11	inducted into the UFC Hall of Fame, right?
12	done, I wanted to do it.	12	A. Correct.
13	Q. And you did, right?	13	Q. And he was also featured Faber was
14	A. Yes.	14	featured do you know if he was featured in two
15	Q. And is it correct that the WEC was that	15	main events in the WEC?
16	the UFC viewed the WEC as a feeder league for	16	A. Yes, pay-per-view.
17	younger, less experienced, lighter weight, and less	17	Q. And I think you said that the UFC also
18	well-known fighters that would eventually move to the	18	acquired the WFA, correct?
19	UFC?	19	A. Correct.
20	A. Well, they focused on smaller weight	20	Q. And the WFA was also an MMA promoter?
21	classes, which we didn't have.	21	A. Yes.
22	But yeah, I'm not going to say we never got	22	Q. And is it correct that the UFC acquired the
23	somebody from the WEC, but they mostly focused on the	23	WFA in 2006?
24	smaller weight classes. But pretty much, every organization	24	A. I don't know the exact date, but yes, we
25		25	did acquire it.

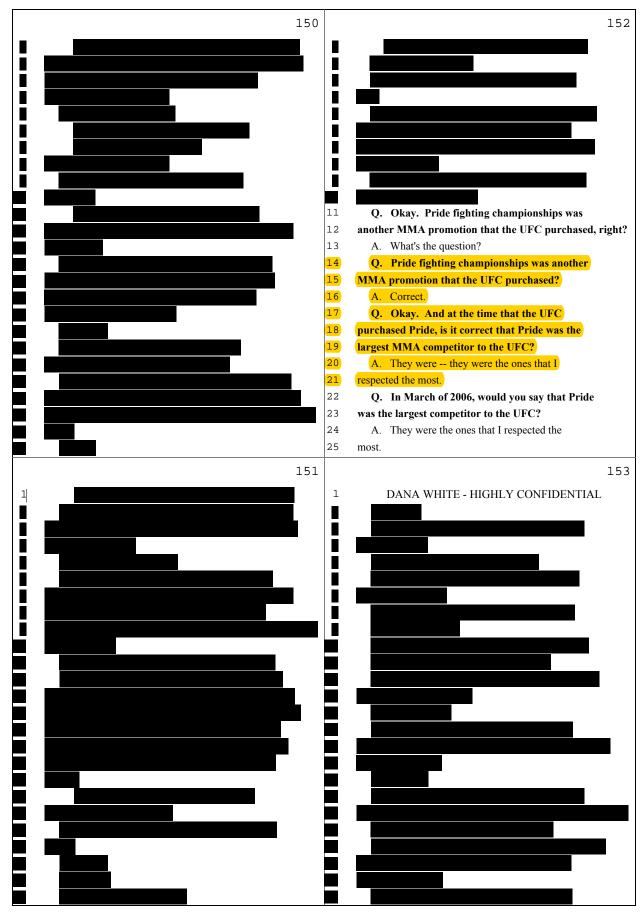
36 (Pages 138 to 141)



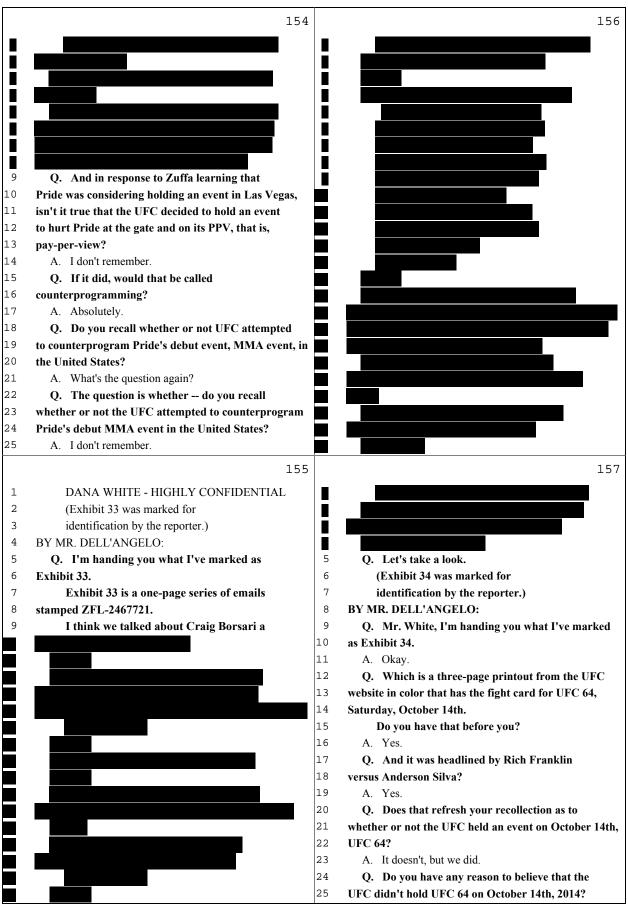
37 (Pages 142 to 145)



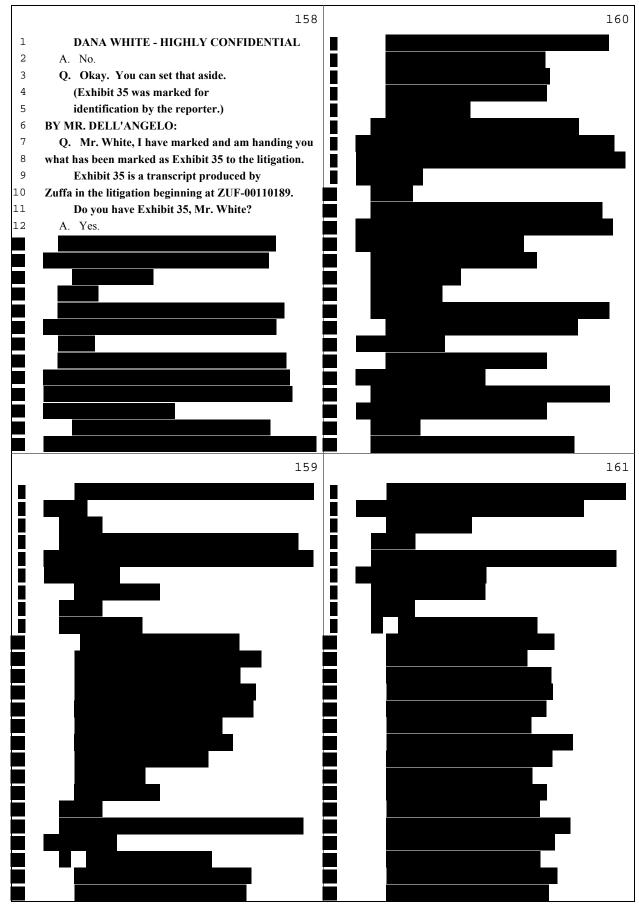
38 (Pages 146 to 149)



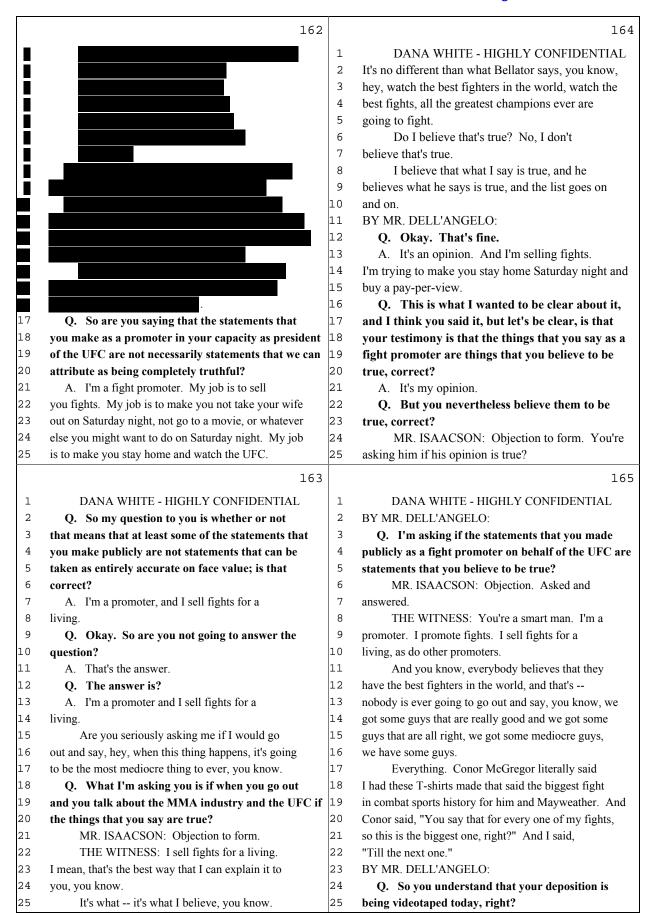
39 (Pages 150 to 153)



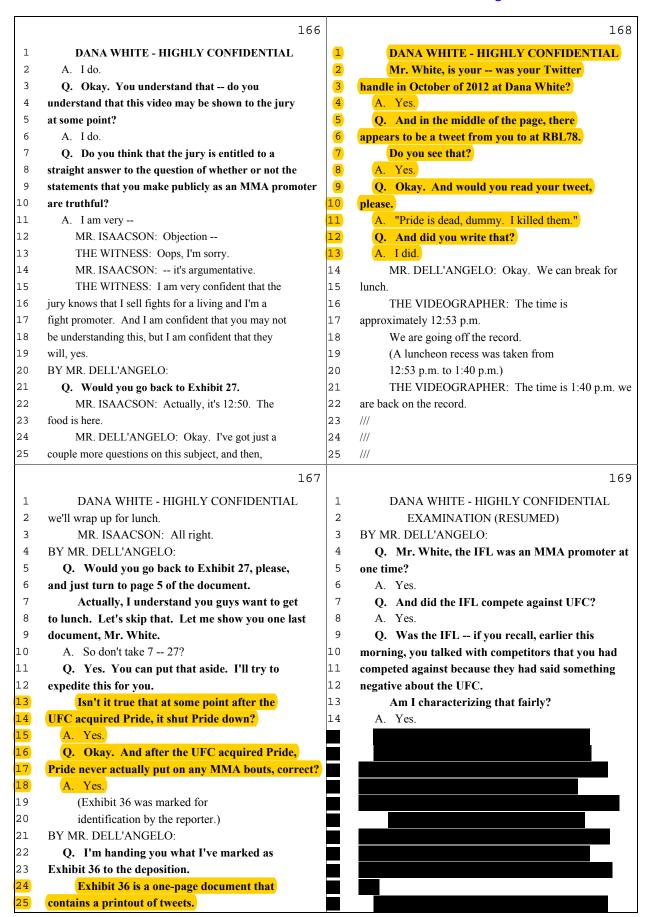
40 (Pages 154 to 157)



41 (Pages 158 to 161)



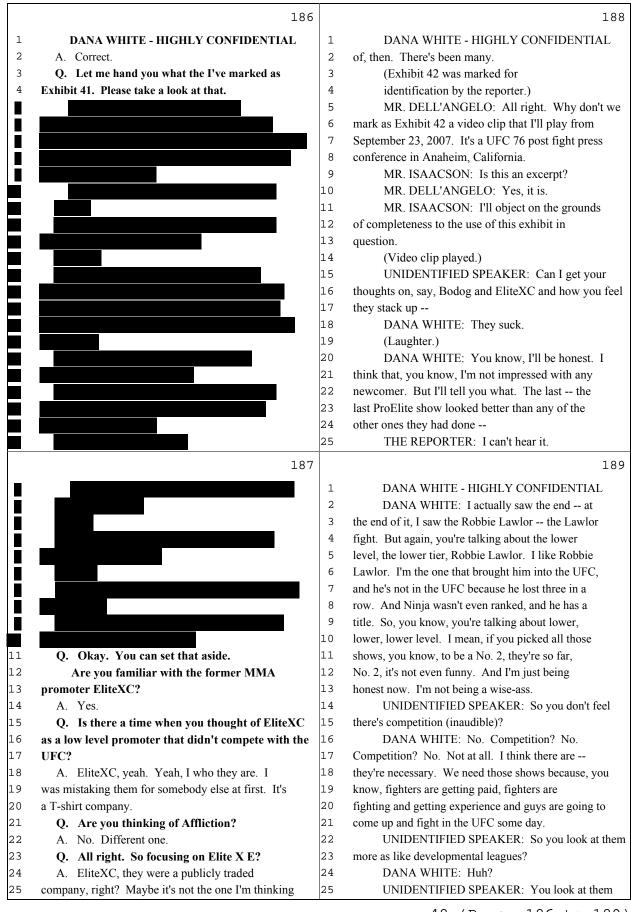
42 (Pages 162 to 165)



43 (Pages 166 to 169)

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	170		172
		1	DANA WHITE - HIGHLY CONFIDENTIAL
		2	FSN and falsely informed FSN that
		3	IFL had illegally hired away two
4	Q. And that was in such a way that the UFC	4	former Zuffa employees, that IFL had
5	would then target the IFL as a competitor that would	5	stolen and was wrongfully using
6	compete against, as you've testified?	6	confidential and/or proprietary
7	MR. ISAACSON: Objection to form.	7	information from Zuffa, including
8	THE WITNESS: Yes, we competed against the	8	business and marketing plans, and
9	IFL.	9	that IFL representatives had gauged
10	BY MR. DELL'ANGELO:	10	unauthorized access to the inner
11	Q. And there was litigation between the IFL	11	television trailer production
12	and the UFC, correct?	12	workings of a UFC sponsored fight."
13	A. Yes.	13	Q. So that's one of the allegations in the IFL
14	Q. And the IFL sued not only the UFC but you	14	complaint against you.
15	personally as well, correct?	15	Do you deny those allegations?
16	A. Oh, I don't remember that.	16	A. No. That's true.
17	(Exhibit 37 was marked for	17	Q. Okay. And
18	identification by the reporter.)	18	A. I don't know if I talked to FSN about it.
19	BY MR. DELL'ANGELO:	19	I don't know if that's true.
20	Q. I'm handing you what I have marked as	20	Q. So let's clarify. What part is true?
21	Exhibit 37 to the deposition.	21	A. That these guys had gone back and done
22	Exhibit 37 is a complaint, International	22	that. What I just told you five minutes ago.
23	Fight League, Inc. versus Zuffa, LLC dba Ultimate	23	Q. Okay. So but the portion about you
24	Fighting Championship and Dana White, individually	24	contacting FSN, you're not sure about?
25	and in his capacity as president of Zuffa, LLC. It's	25	A. You're talking 2006.
	171		173
1	DANA WHITE - HIGHLY CONFIDENTIAL	1	DANA WHITE - HIGHLY CONFIDENTIAL
2	Silva action number 06-CV-0880, southern district of	2	Q. I'm just asking
3	New York, dated February 3, 2006.	3	A. No, no. I'm saying you're talking 2006.
4	Do you have Exhibit 37, Mr. White?	4	Q. Yep.
5	A. Yes.	5	A. I'm trying to get a TV deal. What power I
6	Q. Okay. Does that refresh your recollection	6	do have with any network. Can I just pick up the
7	as to whether or not	7	phone and call FSN? Who do I call at FSN? Who do I
8	A. No.	8	talk to? Who do I let know that this happened? No.
9	Q the International Fight League sued you?	9	That's
10	A. I didn't remember this, and norm this now.	10	Q. It's fair to say that you don't recall?
11	Q. Even looking at the document doesn't remind	11	A. No. It's fair to say that that never
12	you that you were sued by the IFL?	12	happened.
13	A. No, it doesn't.	13	Q. So somebody is not telling the truth,
14		14	
15	Q. Okay. So would you take a look at paragraph 20 of the complaint that's on page 6.	15	right? A. Right.
16	I understand that you don't recall having	16	-
17	been sued by the IFL, but you now have what I will	17	Q. Either the allegation is wrong or you're wrong, right?
18	represent to you is a copy of the complaint by when	18	A. Well, apparently I didn't even remember
19	the IFL sued you.	19	being sued, so apparently I was right because there's
20	Would you read paragraph 20, please.	20	no way I lost this litigation or I'd remember that.
21	A. "On or about January 29th	21	Q. Do you remember the outcome of the
22	2006 and as negotiations between FSN	22	litigation?
23	and plaintiff drew to a close,	23	A. I don't.
24	defendant UFC, though White and	24	Q. Okay. Let's take a turn to paragraph 31.
	other UFC representatives contacted	25	Read paragraph 31, please.?
25			

44 (Pages 170 to 173)



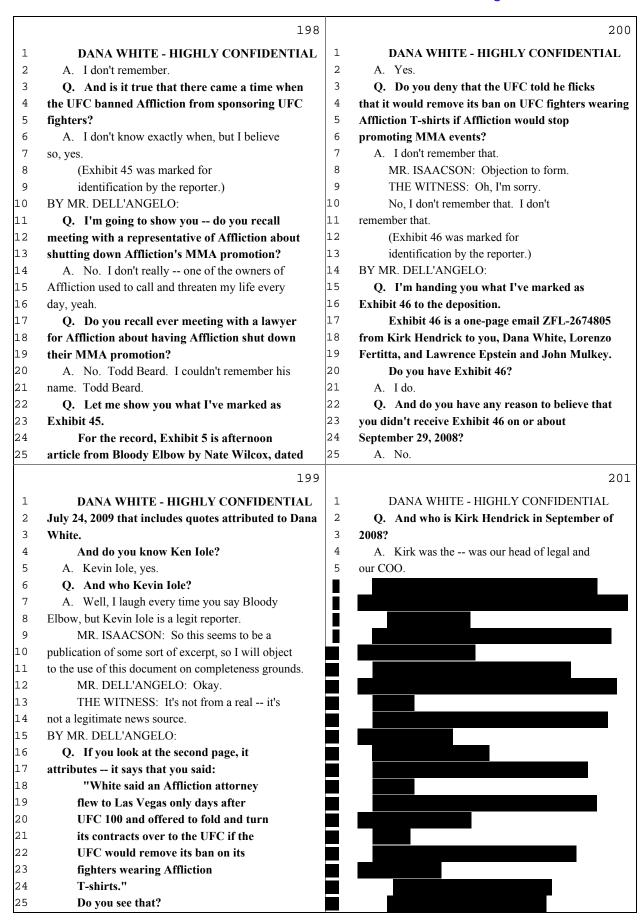
48 (Pages 186 to 189)

	190		192
1	DANA WHITE - HIGHLY CONFIDENTIAL	1	DANA WHITE - HIGHLY CONFIDENTIAL
2	more as like developmental leagues?	2	are asking me?
3	DANA WHITE: Yeah, they're like the	3	MR. DELL'ANGELO: I will withdraw the
4	Triple A.	4	question.
5	(End of video clip.)	5	(Exhibit 43 was marked for
6	BY MR. DELL'ANGELO:	6	identification by the reporter.)
7	Q. Were you able to hear at the beginning of	7	BY MR. DELL'ANGELO:
8	that, Mr. White, that you were asked, can I have your	8	Q. Here's Exhibit 43. Would you take a look
9	thoughts on Bodog and EliteXC.	9	at that, please.
10	A. Yes.	10	Exhibit 43 is a May 29, 2008 article
11	Q. So was that you depicted in the video?	11	entitled "UFC has fight on hands CBS event latest
12	A. Yes.	12	challenge to MMA leader" by Beau Dior in USA Today."
13	Q. And did you say that?	13	Do you have Exhibit 4, Mr. White?
14	A. A younger me.	14	A. Yes.
15	MR. ISAACSON: I'll object to did you say	15	Q. And if you look down at the second
16	that because we haven't said what "that" is. And I'm	16	paragraph, it refers to Kimbo Slice?
17	going to object to the use of this on the additional	17	A. Yep.
18	grounds that I can't hear some of it, the court	18	Q. Kimbo Slice is a former MMA fighter,
19	reporter can't make an accurate transcript of it, and	19	correct?
20	I don't know what the witness can hear of it. We can	20	A. Yes.
21	obviously hear some parts of it.	21	Q. And 2011, it goes on to say that he
22	MR. DELL'ANGELO: Again, please.	22	competes in Elite Xtreme Combat.
23	MR. ISAACSON: You didn't make that clear	23	Do you see that?
24	because people don't know who aren't here what can be	24	A. Yes.
25	heard and what can't be heard.	25	Q. You can take a minute to read this, but I
	191		193
			175
1	DANA WHITE - HIGHLY CONFIDENTIAL	1	DANA WHITE - HIGHLY CONFIDENTIAL
1 2	DANA WHITE - HIGHLY CONFIDENTIAL BY MR. DELL'ANGELO:	1 2	
		_	DANA WHITE - HIGHLY CONFIDENTIAL
2	BY MR. DELL'ANGELO:	2	DANA WHITE - HIGHLY CONFIDENTIAL would direct your attention to the quote a few lines
2	BY MR. DELL'ANGELO: Q. So Mr. White, the statements that you made	3	DANA WHITE - HIGHLY CONFIDENTIAL would direct your attention to the quote a few lines down where you're quoted as saying "Whether they like
2 3 4	BY MR. DELL'ANGELO: Q. So Mr. White, the statements that you made in that video, were they statements that you believed	3 4	DANA WHITE - HIGHLY CONFIDENTIAL would direct your attention to the quote a few lines down where you're quoted as saying "Whether they like it or not, they're the farm league," UFC president
2 3 4 5	BY MR. DELL'ANGELO: Q. So Mr. White, the statements that you made in that video, were they statements that you believed to be true at the time?	3 4 5	DANA WHITE - HIGHLY CONFIDENTIAL would direct your attention to the quote a few lines down where you're quoted as saying "Whether they like it or not, they're the farm league," UFC president Dana White says."
2 3 4 5 6	BY MR. DELL'ANGELO: Q. So Mr. White, the statements that you made in that video, were they statements that you believed to be true at the time? MR. ISAACSON: I object to the question	2 3 4 5 6 7 8	DANA WHITE - HIGHLY CONFIDENTIAL would direct your attention to the quote a few lines down where you're quoted as saying "Whether they like it or not, they're the farm league," UFC president Dana White says." Do you see that? A. Yes. Q. And did you say in May of 2009 that EliteXC
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2 3 4 5 6 7 8 9 10 11	BY MR. DELL'ANGELO: Q. So Mr. White, the statements that you made in that video, were they statements that you believed to be true at the time? MR. ISAACSON: I object to the question because the statements can't be heard. MR. DELL'ANGELO: I believe the witness testified he was able to hear them, right? MR. ISAACSON: He did not testify he could hear all the statements. BY MR. DELL'ANGELO:	2 3 4 5 6 7 8 9 10 11	DANA WHITE - HIGHLY CONFIDENTIAL would direct your attention to the quote a few lines down where you're quoted as saying "Whether they like it or not, they're the farm league," UFC president Dana White says." Do you see that? A. Yes. Q. And did you say in May of 2009 that EliteXC was a farm league? A. It says I said it. Q. Okay. Do you have any reason to disagree that in May of 2008, you viewed the UFC as a farm
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	BY MR. DELL'ANGELO: Q. So Mr. White, the statements that you made in that video, were they statements that you believed to be true at the time? MR. ISAACSON: I object to the question because the statements can't be heard. MR. DELL'ANGELO: I believe the witness testified he was able to hear them, right? MR. ISAACSON: He did not testify he could hear all the statements. BY MR. DELL'ANGELO: Q. Were you able to hear your statements in the video? A. I think I did. Q. Okay. And to the extent	2 3 4 5 6 7 8 9 10 11 12 13 14 15	DANA WHITE - HIGHLY CONFIDENTIAL would direct your attention to the quote a few lines down where you're quoted as saying "Whether they like it or not, they're the farm league," UFC president Dana White says." Do you see that? A. Yes. Q. And did you say in May of 2009 that EliteXC was a farm league? A. It says I said it. Q. Okay. Do you have any reason to disagree that in May of 2008, you viewed the UFC as a farm league? A. No. (Exhibit 44 was marked for identification by the reporter.)
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	BY MR. DELL'ANGELO: Q. So Mr. White, the statements that you made in that video, were they statements that you believed to be true at the time? MR. ISAACSON: I object to the question because the statements can't be heard. MR. DELL'ANGELO: I believe the witness testified he was able to hear them, right? MR. ISAACSON: He did not testify he could hear all the statements. BY MR. DELL'ANGELO: Q. Were you able to hear your statements in the video? A. I think I did. Q. Okay. And to the extent A. I don't know if I missed anything. Q. To the extent that you believe you did, are they statements that you believed to be true about	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	DANA WHITE - HIGHLY CONFIDENTIAL would direct your attention to the quote a few lines down where you're quoted as saying "Whether they like it or not, they're the farm league," UFC president Dana White says." Do you see that? A. Yes. Q. And did you say in May of 2009 that EliteXC was a farm league? A. It says I said it. Q. Okay. Do you have any reason to disagree that in May of 2008, you viewed the UFC as a farm league? A. No. (Exhibit 44 was marked for identification by the reporter.) BY MR. DELL'ANGELO: Q. I'm handing you what I've marked as Exhibit 44, Mr. White. There you go.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	BY MR. DELL'ANGELO: Q. So Mr. White, the statements that you made in that video, were they statements that you believed to be true at the time? MR. ISAACSON: I object to the question because the statements can't be heard. MR. DELL'ANGELO: I believe the witness testified he was able to hear them, right? MR. ISAACSON: He did not testify he could hear all the statements. BY MR. DELL'ANGELO: Q. Were you able to hear your statements in the video? A. I think I did. Q. Okay. And to the extent A. I don't know if I missed anything. Q. To the extent that you believe you did, are they statements that you believed to be true about EliteXC?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	DANA WHITE - HIGHLY CONFIDENTIAL would direct your attention to the quote a few lines down where you're quoted as saying "Whether they like it or not, they're the farm league," UFC president Dana White says." Do you see that? A. Yes. Q. And did you say in May of 2009 that EliteXC was a farm league? A. It says I said it. Q. Okay. Do you have any reason to disagree that in May of 2008, you viewed the UFC as a farm league? A. No. (Exhibit 44 was marked for identification by the reporter.) BY MR. DELL'ANGELO: Q. I'm handing you what I've marked as Exhibit 44, Mr. White. There you go. Exhibit 44 is an article from ESPN.com,
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	BY MR. DELL'ANGELO: Q. So Mr. White, the statements that you made in that video, were they statements that you believed to be true at the time? MR. ISAACSON: I object to the question because the statements can't be heard. MR. DELL'ANGELO: I believe the witness testified he was able to hear them, right? MR. ISAACSON: He did not testify he could hear all the statements. BY MR. DELL'ANGELO: Q. Were you able to hear your statements in the video? A. I think I did. Q. Okay. And to the extent A. I don't know if I missed anything. Q. To the extent that you believe you did, are they statements that you believed to be true about EliteXC? MR. ISAACSON: Object to the form of the	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	DANA WHITE - HIGHLY CONFIDENTIAL would direct your attention to the quote a few lines down where you're quoted as saying "Whether they like it or not, they're the farm league," UFC president Dana White says." Do you see that? A. Yes. Q. And did you say in May of 2009 that EliteXC was a farm league? A. It says I said it. Q. Okay. Do you have any reason to disagree that in May of 2008, you viewed the UFC as a farm league? A. No. (Exhibit 44 was marked for identification by the reporter.) BY MR. DELL'ANGELO: Q. I'm handing you what I've marked as Exhibit 44, Mr. White. There you go. Exhibit 44 is an article from ESPN.com, dated July 6, 2007, titled "White not worried about
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. So Mr. White, the statements that you made in that video, were they statements that you believed to be true at the time? MR. ISAACSON: I object to the question because the statements can't be heard. MR. DELL'ANGELO: I believe the witness testified he was able to hear them, right? MR. ISAACSON: He did not testify he could hear all the statements. BY MR. DELL'ANGELO: Q. Were you able to hear your statements in the video? A. I think I did. Q. Okay. And to the extent A. I don't know if I missed anything. Q. To the extent that you believe you did, are they statements that you believed to be true about EliteXC? MR. ISAACSON: Object to the form of the question. We won't know what he heard or did not	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	DANA WHITE - HIGHLY CONFIDENTIAL would direct your attention to the quote a few lines down where you're quoted as saying "Whether they like it or not, they're the farm league," UFC president Dana White says." Do you see that? A. Yes. Q. And did you say in May of 2009 that EliteXC was a farm league? A. It says I said it. Q. Okay. Do you have any reason to disagree that in May of 2008, you viewed the UFC as a farm league? A. No. (Exhibit 44 was marked for identification by the reporter.) BY MR. DELL'ANGELO: Q. I'm handing you what I've marked as Exhibit 44, Mr. White. There you go. Exhibit 44 is an article from ESPN.com, dated July 6, 2007, titled "White not worried about the competition."
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	BY MR. DELL'ANGELO: Q. So Mr. White, the statements that you made in that video, were they statements that you believed to be true at the time? MR. ISAACSON: I object to the question because the statements can't be heard. MR. DELL'ANGELO: I believe the witness testified he was able to hear them, right? MR. ISAACSON: He did not testify he could hear all the statements. BY MR. DELL'ANGELO: Q. Were you able to hear your statements in the video? A. I think I did. Q. Okay. And to the extent A. I don't know if I missed anything. Q. To the extent that you believe you did, are they statements that you believed to be true about EliteXC? MR. ISAACSON: Object to the form of the question. We won't know what he heard or did not hear.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	DANA WHITE - HIGHLY CONFIDENTIAL would direct your attention to the quote a few lines down where you're quoted as saying "Whether they like it or not, they're the farm league," UFC president Dana White says." Do you see that? A. Yes. Q. And did you say in May of 2009 that EliteXC was a farm league? A. It says I said it. Q. Okay. Do you have any reason to disagree that in May of 2008, you viewed the UFC as a farm league? A. No. (Exhibit 44 was marked for identification by the reporter.) BY MR. DELL'ANGELO: Q. I'm handing you what I've marked as Exhibit 44, Mr. White. There you go. Exhibit 44 is an article from ESPN.com, dated July 6, 2007, titled "White not worried about the competition." A. Yes.
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196 194 DANA WHITE - HIGHLY CONFIDENTIAL DANA WHITE - HIGHLY CONFIDENTIAL 1 1 2 it says, "ESPN The Magazine" on the first page? 2 said I'm totally scared of all these guys and I'm 3 A. Yes. 3 worried about them because you are talking about IFL 4 4 who those guys had a lot of money, and the guy from Q. Then if you go up, it says, "ESPN the 5 magazine" again. Then it follows, "do you watch Bodog, another criminal, but he had a lot of money. 6 6 other shows." BY MR. DELL'ANGELO: 7 7 Do you see that? Q. Just so I'm clear, are you saying that take 8 the time in 2007 that you were scared about EliteXC A. Yes. 8 9 9 Q. Then go up one more. "ESPN The Magazine and Bodog as competing promotions to the UFC? 10 10 how do you feel." A. Well, you're insane if you don't worry 11 11 about your competition. You absolutely have to worry Do see that? 12 about your competition. A. Yes. 12 13 13 Q. Okay. It says: Q. And so, was EliteXC and Bodog competition 14 14 "ESPN The Magazine: How do you that you were concerned about in 2007? 15 15 feel about the IFL, Bodog, EliteXC A. Yeah. So Bodog, this guy had nothing but 16 and the other competition popping 16 cash. The guy lived on an island somewhere, Calvin 17 up?" Ayre, who was doing illegal gaming and was offering 17 18 Do you see that? 18 guys huge money just to fly out and hang out with him 19 19 on the island. And yeah, you got to. You got to A. Yes. 20 20 worry about that. Q. Would you read your answer, please. 21 A. "It's good for us. I don't 21 Q. So you were legitimately concerned about 22 22 Look at those guys as competition at Bodog as a competitor as well? 23 all. They're nowhere near the A. Definitely. 24 league that we're in. I need shows 24 Q. They're not in business anymore, right? like this. They're the feeder 25 Let me withdraw that. They're not in the 195 197 1 DANA WHITE - HIGHLY CONFIDENTIAL 1 DANA WHITE - HIGHLY CONFIDENTIAL 2 leagues. All the guys who fight in 2 MMA promotion business, correct? 3 those shows aspire to be in the UFC 3 A. I'm not sure, but I think he's in prison, 4 some day. They're creating all the 4 so yeah, it would be pretty tough for him to be in 5 UFC talent of tomorrow." 5 business. 6 Q. Did you say that in July of 2007? 6 Q. I'm asking about the business itself. Do 7 7 A. I don't know. you know if Bodog is still promoting MMA events? 8 Q. Any reason that you disagree that that 8 A. I don't think so. I don't know, though. 9 9 was -- well, withdraw that. Q. Okay. 10 10 Was that true in July of 2007? A. He could be. I think he's in prison. 11 MR. ISAACSON: Objection to form. 11 O. Affliction entertainment, is that an MMA 12 THE WITNESS: Any reason not to believe it 12 promotion created by Affliction clothing? 13 13 was true? A. Yes. 14 BY MR. DELL'ANGELO: 14 Q. And was Affliction clothing in the business 15 Q. Withdraw again. 15 of sponsoring MMA fighters? 16 Yeah. Do you believe that was true in July 16 A. Yes. 17 17 Q. And did Affliction clothing ever sponsor of 2007? 18 18 MR. ISAACSON: Objection to form. fighters in the UFC? 19 THE WITNESS: Should I said I'm horrified 19 20 20 Q. And did Affliction clothing sponsor UFC and terrified of all this competition? 21 BY MR. DELL'ANGELO: 21 fighters at the time that Affliction Entertainment 22 Q. I'm just asking for the truth, Mr. White. 22 was promoting MMA events? 23 23 A. It's the truth. A. Yes. 24 24 MR. ISAACSON: Objection to form. Q. And when did you first learn that 25 THE WITNESS: The truth is I should have 25 Affliction was going to start promoting MMA events?

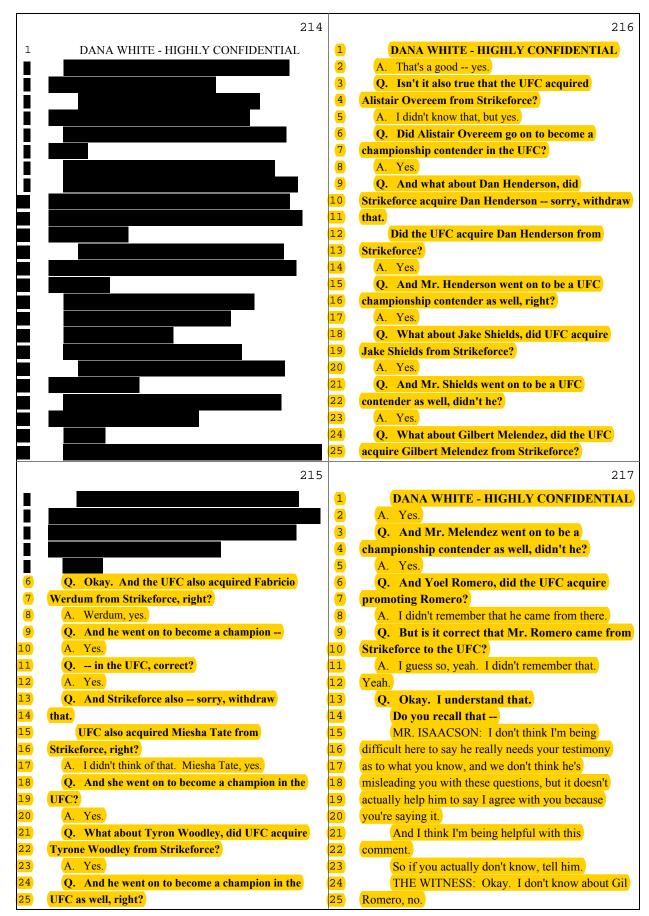
50 (Pages 194 to 197)



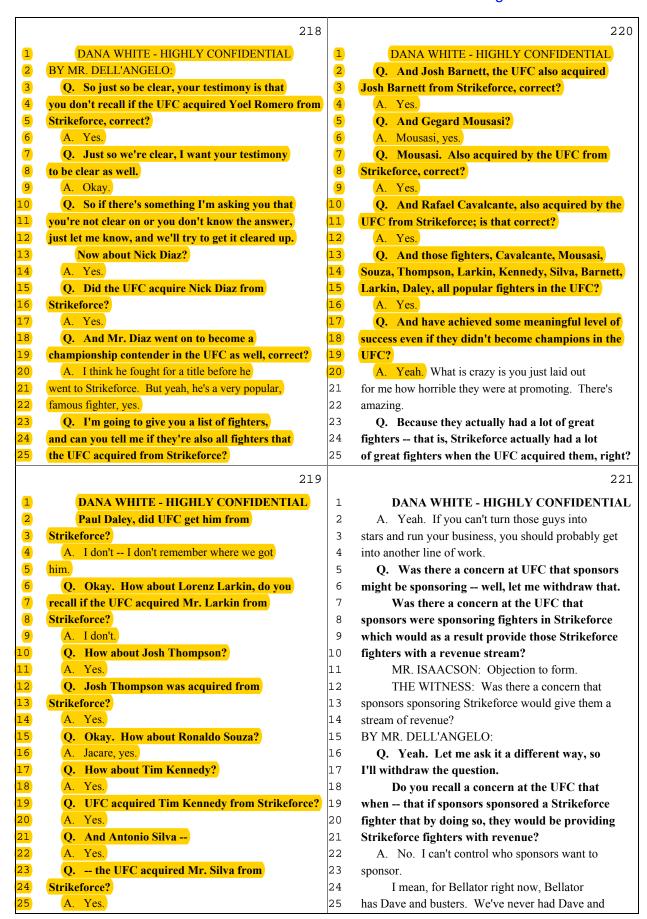
51 (Pages 198 to 201)

	210		212
1	DANA WHITE - HIGHLY CONFIDENTIAL	1	DANA WHITE - HIGHLY CONFIDENTIAL
2	A. Yes. I have nicknames.	2	(End of video clip.)
3	Q. Did you call there came a time when the	3	MR. KOFFMAN: Sorry, I think I played the
4	UFC acquired Strikeforce, right?	4	wrong one.
5	A. Right.	5	MR. DELL'ANGELO: All right.
6	Q. And after the UFC acquired Strikeforce, did	6	(Video clip played.)
7	you stop calling Strikeforce Strike Farse?	7	UNIDENTIFIED SPEAKER: You've always spoken
8	A. I did.	8	highly about Strikeforce, but are the gloves off now?
9	Q. Did you hear yourself call Strikeforce a	9	They're having a conference call with Fedor at the
10	tiny little regional show with nobody in it?	10	very same time as your press conference. Are you
11	A. Yes.	11	going to look upon Strikeforce as benignly? You
12	Q. Is that something that you believed to be	12	always say when people come at you, you're there. Do
13	true in August of 2009?	13	they come at you now?
14	A. I don't know what I believed in August of,	14	DANA WHITE: You just answered your own
15	you know, 2009, but yeah, I said it.	15	question. They should have stayed the way they were.
16	Q. Okay. Was there a was there a time when	16	UNIDENTIFIED SPEAKER: So are you going to
17	you believed that Strikeforce was a tiny little	17	do the same things you did with Affliction and
18	regional show with nobody in it?	18	counterprogram?
19	A. Is there a time that I believed that?	19	DANA WHITE: We'll see what happens. If
20	Q. Yes.	20	they want to fight anymore, we'll fight. We know how
21	A. Apparently.	21	that goes, and you know how it ends.
22	Q. Well, as you sit here today, do you know	22	MR. ISAACSON: So I'll object because the
23	whether or not you believed that at some point?	23	questioner was inaudible at times, so the court
24	A. I've done a zillion of those interviews. I	24	reporter is unable to create a transcript.
25	don't know what I believed at the time when I said	25	MR. DELL'ANGELO: I'm not really sure how
	211		213
1	DANA WHITE - HIGHLY CONFIDENTIAL	1	DANA WHITE - HIGHLY CONFIDENTIAL
2	it, but I said it.	2	you can know that but
3	Q. All right. And there came a time when	3	MR. ISAACSON: Because she's typed into the
4	Strikeforce was trying to become more than a tiny	4	transcript "I cannot hear."
5	little regional show, right?	5	MR. DELL'ANGELO: Okay. You have the
6	A. I don't know what their intentions were	6	Livenote, I don't. So now we know.
7	when they were building their business.	7	BY MR. DELL'ANGELO:
8	Q. All right. I'm going to play you another	8	Q. Mr. White, in the video that was just
9	video clip taken from the same August 6, 2009 UFC 101	9	played, you were asked a question about Strikeforce,
10	prefight press conference in Philadelphia, which is	10	and you said that they should have stayed the way
11	an excerpt, which we will mark as Exhibit 48.	11	they were.
12	(Exhibit 48 was marked for	12	Were you able to hear that part?
13	identification by the reporter.)	13	A. Yes.
14	MR. ISAACSON: Object to the use of this	14	Q. And what did you mean that Strikeforce
15	exhibit on completeness grounds.	15	should have stayed the way they were?
16	BY MR. DELL'ANGELO:	16	A. I don't know. But boy, was I wrong, that
17	Q. Mr. White, would you direct your attention	17	they didn't have any money. They lost 30-something
18	to the video monitor and watch the clip we're to	18	million dollars, so I guess I was wrong on that one.
19	play.	19	They had money.
20	A. Yes.	20	Q. You ultimately acquired them, though,
21	(Video clip played.)	21	right?
22	DANA WHITE: Strikeforce probably isn't	22	A. Yes.
23	even the deal that he had with Affliction. You know	23	Q. And did you acquire them because they had
24	what I mean? They have no money. They have no	24	something that the UFC wanted?
25	money.	25	A. Yes.
		1	

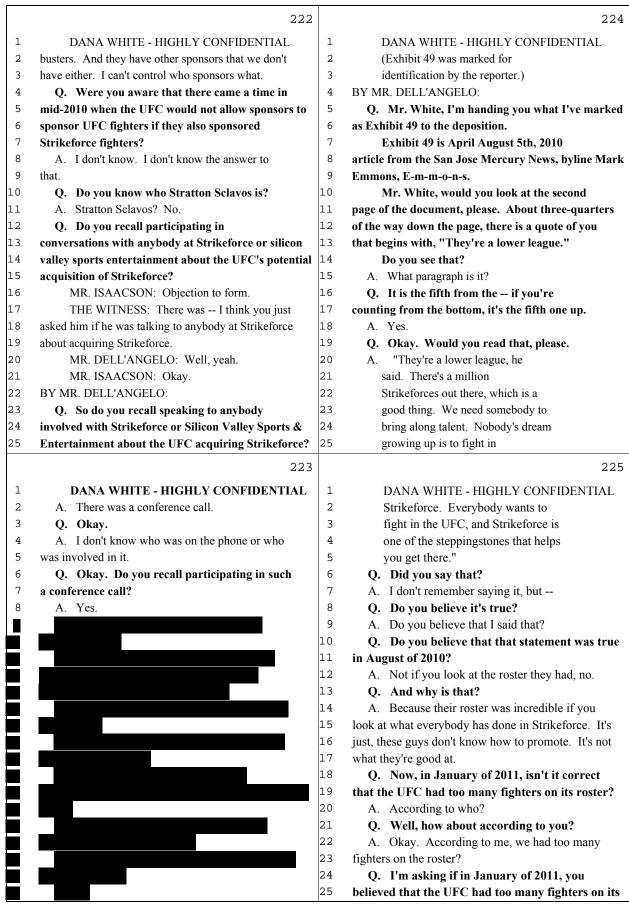
54 (Pages 210 to 213)



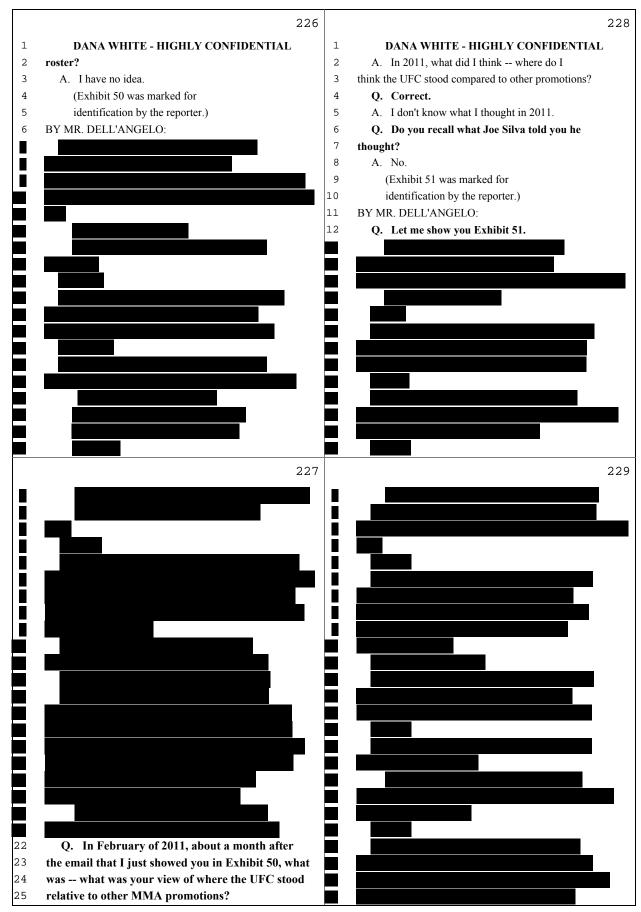
55 (Pages 214 to 217)



56 (Pages 218 to 221)



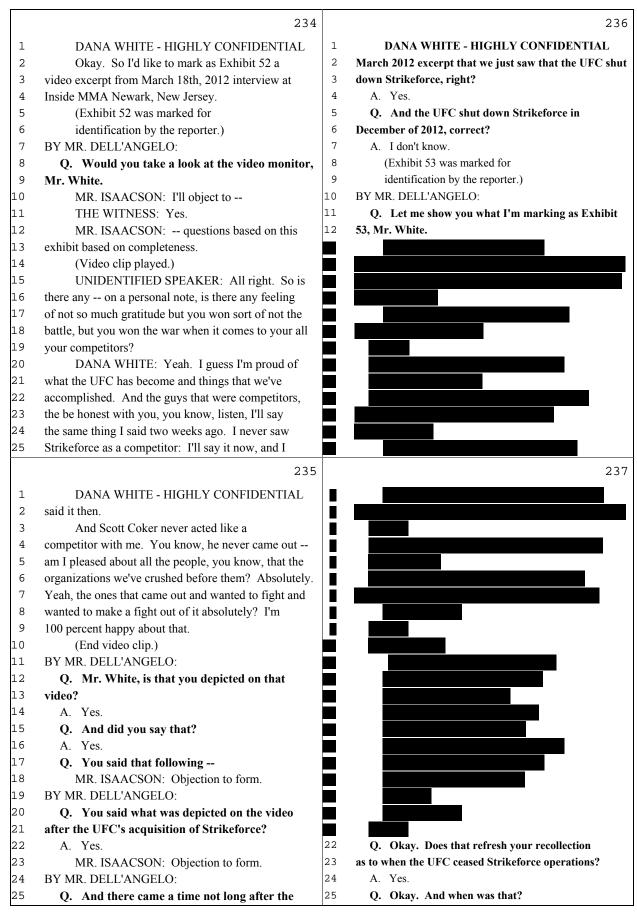
57 (Pages 222 to 225)



58 (Pages 226 to 229)



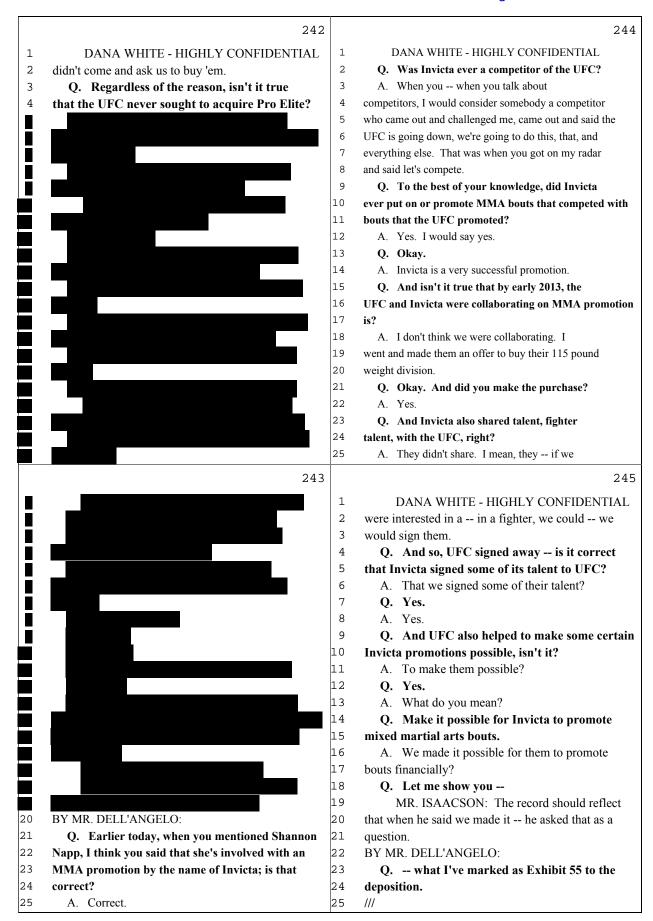
59 (Pages 230 to 233)



60 (Pages 234 to 237)

238 240 DANA WHITE - HIGHLY CONFIDENTIAL 1 1 DANA WHITE - HIGHLY CONFIDENTIAL 2 A. January 2013. 2 I will mark this as Exhibit 54. 3 3 Q. Okay. And as a result of the UFC ceasing (Exhibit 54 was marked for 4 4 Strikeforce operations, it absorbed Strikeforce identification by the reporter.) 5 fighters or released those whom it didn't absorb into 5 MR. ISAACSON: I'll object to the use of 6 6 the UFC, correct? this exhibit in question on the grounds of 7 7 completeness. You said before what the date of this A. Yes. 8 Q. And the Strikeforce acquisition was very 8 was. 9 beneficial to the UFC, wasn't it? 9 (Video clip played.) 10 10 A. Was it beneficial? DANA WHITE: We saw some value there. 11 11 O. Yeah. Library? Well, I mean, just look at what's happened 12 12 A. We've turned everything we've done into with Diaz, the fight that we did with Diaz, just one 13 13 success. guy. If you look at what we paid for Strikeforce and 14 14 O. And the Strikeforce acquisition enabled the one guy what we did with that fight, and if you look 15 UFC to put on some really massive fights, right? 15 at the purchase of Pride, the library, you've got to 16 A. Yeah --16 see that all over TV, we're doing the Best of Pride 17 17 and all this stuff. MR. ISAACSON: Objection. 18 THE WITNESS: I wasn't out looking to 18 And then, you see -- because I saw 19 acquire Strikeforce. Strikeforce called us. 19 somebody -- I keep talking about the internet. The 20 BY MR. DELL'ANGELO: 20 internet drives me crazy. 21 Q. My question -- move to strike as 21 So they're saying, you know, it was the 22 22 most expensive fight library in history. You're an nonresponsive. 23 My question to you is: Did the UFC's of 23 idiot, the guy who wrote that. 24 Strikeforce allow the UFC to put on massive fights? 24 If you look at the talent that we've had 25 MR. ISAACSON: Objection to form. 25 from Pride and how many fights we've done, huge, 239 241 DANA WHITE - HIGHLY CONFIDENTIAL 1 1 DANA WHITE - HIGHLY CONFIDENTIAL 2 THE WITNESS: Yes. 2 massive fights that have made tons of revenue and 3 BY MR. DELL'ANGELO: 3 helped build our library, Pride and Strikeforce were 4 O. Okav. 4 both great purchases, and so was the WEC. 5 A. They called us to acquire them, we didn't 5 (End of video clip.) 6 call them. б BY MR. DELL'ANGELO: 7 Q. Okay. I move to strike as nonresponsive 7 Q. Mr. White, was that you on the video? 8 everything after "Yes." 8 9 9 So is it also true that as a result of the Q. Were you able to hear yourself okay? 10 UFC's acquisition of Strikeforce that the UFC has 10 A. Yes. 11 been able to generate substantial revenue? 11 Q. Okay. And did you say what you heard 12 12 A. Yes. Because we turned all those guys that depicted on the video that I played just now? 13 13 they couldn't turn into stars into stars. A. Yes. 14 MR. DELL'ANGELO: Move to strike everything 14 Q. Okay. And is what you said on the video 15 after "Yes" as nonresponsive. 15 clip that I just played, was that true at the time 16 MR. ISAACSON: Just so you understand, when 16 that you said it in April of 2013? 17 17 he makes a motion, that doesn't mean it's granted. A. Yes. 18 THE WITNESS: Got it. 18 MR. ISAACSON: Objection, compound. 19 MR. ISAACSON: So don't worry about that. 19 BY MR. DELL'ANGELO: 20 20 THE WITNESS: I'm not worried. It's funny. Q. Pro Elite was also an MMA promotion, 21 BY MR. DELL'ANGELO: 21 correct? 22 Q. So I'd like to play another video for you. 22 A. Yes. 23 It's an excerpt taken from that same April 8th, 2013 23 Q. And the UFC never sought to acquire Pro 24 24 Global Speaker Series that you did at the Stanford 25 25 Graduate School Of Business in Stanford, California. A. We never sought to acquire anybody that

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62 (Pages 242 to 245)

	246		248
1	DANA WHITE - HIGHLY CONFIDENTIAL	1	DANA WHITE - HIGHLY CONFIDENTIAL
2	(Exhibit 55 was marked for	2	(Exhibit 56 was marked for
3	identification by the reporter.)	3	identification by the reporter.)
4	BY MR. DELL'ANGELO:	4	(Video clip played.)
5	Q. Exhibit 55 is a two-page email, Bates	5	DANA WHITE: So we were going to sign her.
6	ZFL-1006180. The bottom email in the chain is from	6	We were going to sign her to a contact, and then, we
7	Shannon Knapp to df@ufc.com, dated December 6, 2013,	7	were going to have her fight in Invicta, which means
8	subject: Re thanks.	8	we pay all the bills for her to fight in Invicta.
9	So the email address, dfw@ufc.com, is that	9	Instead, she'd be under a UFC contract with all the
10	one of your email addresses that you used at the UFC?	10	perks and benefits of being a UFC fighter and would
11	A. Yes.	11	fight in Invicta, though.
12	Q. Do you have any reason to believe that you	12	(End of video clip.)
13	didn't receive this email from Shannon Knapp at the	13	BY MR. DELL'ANGELO:
14	bottom of the page on December 6, 2013?	14	Q. Were you able to hear that video,
15	A. No.	15	Mr. White?
16	Q. In fact, if you look at the top of the	16	A. Yes.
17	page, it looks like you responded to Ms. Knapp. "You	17	Q. Did that refer to Cyborg, do you know?
18	got it."	18	A. I don't know. I was going to ask you.
19	Do you see that?	19	Q. All right. There came a time that the UFC
20	A. No, she did. She said that. I said,	20	entered into a historic deal with Invicta, correct?
21	"Thank you, and kick some ass this weekend."	21	MR. ISAACSON: Objection to form.
22	Q. And she responded you, "Got it"	22	THE WITNESS: I don't know. What is the
23	A. Right.	23	deal?
24	Q with a little emoji face right there.	24	BY MR. DELL'ANGELO:
25	So if you look down there at the first	25	Q. It's for the Invicta fights appearing on
	247		249
1	DANA WHITE - HIGHLY CONFIDENTIAL	1	DANA WHITE - HIGHLY CONFIDENTIAL
2	email on there chain, the second paragraph from	2	Fight Pass.
3	Ms. Knapp to you and Lorenzo Fertitta says:	3	A. Okay. Yeah. Yeah.
4	"I will continue to 100 percent	4	Q. Are you aware that you know
5	support you both, your promotion and	5	A. Why was it historic?
6	all your athletes. I really do	6	Q. Do you know who Marshall Zelaznik is?
7	appreciate you both."	7	
8		1 '	A. Yes.
1	Do you see that?	8	A. Yes. Q. Who is Marshall Zelaznik?
9	Do you see that? A. Yes.		
	•	8	Q. Who is Marshall Zelaznik?A. He ran well, he did acquisitions for us and did TV deals and things like that.
9 10 11	A. Yes.Q. And just above that, she says:"I really appreciate what you did	8 9	 Q. Who is Marshall Zelaznik? A. He ran well, he did acquisitions for us and did TV deals and things like that. Q. And he was in charge of Fight Pass at the
9 10 11 12	A. Yes.Q. And just above that, she says:"I really appreciate what you did for me and how you made this event	8 9 10	 Q. Who is Marshall Zelaznik? A. He ran well, he did acquisitions for us and did TV deals and things like that. Q. And he was in charge of Fight Pass at the UFC, or he was in charge of the content?
9 10 11 12 13	 A. Yes. Q. And just above that, she says: "I really appreciate what you did for me and how you made this event possible. I won't forget." 	8 9 10 11	 Q. Who is Marshall Zelaznik? A. He ran well, he did acquisitions for us and did TV deals and things like that. Q. And he was in charge of Fight Pass at the UFC, or he was in charge of the content? A. Yeah, content.
9 10 11 12 13 14	A. Yes. Q. And just above that, she says: "I really appreciate what you did for me and how you made this event possible. I won't forget." Do you see that?	8 9 10 11 12	 Q. Who is Marshall Zelaznik? A. He ran well, he did acquisitions for us and did TV deals and things like that. Q. And he was in charge of Fight Pass at the UFC, or he was in charge of the content? A. Yeah, content. Q. Okay. Let me show you what I'm marking as
9 10 11 12 13 14 15	 A. Yes. Q. And just above that, she says: "I really appreciate what you did for me and how you made this event possible. I won't forget." Do you see that? A. Yes. 	8 9 10 11 12 13 14	 Q. Who is Marshall Zelaznik? A. He ran well, he did acquisitions for us and did TV deals and things like that. Q. And he was in charge of Fight Pass at the UFC, or he was in charge of the content? A. Yeah, content. Q. Okay. Let me show you what I'm marking as Exhibit 57.
9 10 11 12 13 14 15 16	 A. Yes. Q. And just above that, she says: "I really appreciate what you did for me and how you made this event possible. I won't forget." Do you see that? A. Yes. Q. Do you know what event Ms. Knapp was 	8 9 10 11 12 13 14 15	 Q. Who is Marshall Zelaznik? A. He ran well, he did acquisitions for us and did TV deals and things like that. Q. And he was in charge of Fight Pass at the UFC, or he was in charge of the content? A. Yeah, content. Q. Okay. Let me show you what I'm marking as Exhibit 57. (Exhibit 57 was marked for
9 10 11 12 13 14 15 16	 A. Yes. Q. And just above that, she says: "I really appreciate what you did for me and how you made this event possible. I won't forget." Do you see that? A. Yes. Q. Do you know what event Ms. Knapp was thanking you and Mr. Fertitta for making possible? 	8 9 10 11 12 13 14 15 16	 Q. Who is Marshall Zelaznik? A. He ran well, he did acquisitions for us and did TV deals and things like that. Q. And he was in charge of Fight Pass at the UFC, or he was in charge of the content? A. Yeah, content. Q. Okay. Let me show you what I'm marking as Exhibit 57. (Exhibit 57 was marked for identification by the reporter.)
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